MCI WORLDCOM   ORIGINAL

November 4, 1999   FX PARTE OR LATE FILED

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

> <u>CC Docket No. 99-295; Application by Bell Atlantic for Authorization to Provide
> In-Region InterLATA Services in New York</u>

Dear Ms. Salas:

On November 3, 1999, Keith Seat, Karen Kinard, Kim Scardino, Rob Lopardo and I of MCI
WorldCom and Mark Schneider of Jenner & Block met with the following members of the
Common Carrier Bureau: Daniel Shiman, Julie Patterson, Eric Einhorn, Raj Kannan, John Stanley,
Johanna Mikes, Jessica Rosenworcel, Alex Belinfante, and Rhonda Lien. We discussed the
remaining barriers to local competition in New York in the context of the above-referenced
docket. Specifically, we discussed Bell Atlantic's unacceptably low flow-through rates, continuing
failure to institute adequate change management processes, and lack of an adequate application-to-
application pre-ordering interface. We also discussed Bell Atlantic's high pricing for, and lack of
information on, DSL-capable loop and inadequate performance remedies. We distributed the
attached documents at the meeting.

In accordance with section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), an
original and one copy of this memorandum and attachment are being filed with your office.

Sincerely,

Lori Wright
Senior Manager, Regulatory Affairs

cc: Daniel Shiman, Julie Patterson, Eric Einhorn, Raj Kannan, John Stanley, Johanna Mikes,
        Jessica Rosenworcel, Alex Belinfante, and Rhonda Lien

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[Message sent on November 2, 1999; December 31 date in message is erroneous.]

-----Original Message-----
From: Allison O'Neill [SMTP:Allison.Oneill@mci.com]
Sent: Friday, December 31, 1999 4:31 PM
To: r_michael.toothman@BellAtlantic.com
Cc: 'Jennifer. E. Ross (E-mail); Sherry Lichtenberg (E-mail); Kimberly A.
Scardino (E-mail); charlene.keys@wcom.com; tyra.colbert@wcom.com;
don.hall@wcom.com; ba.change_control@bellatlantic.COM;
marion.c.jordan@BellAtlantic.com; francis.h.salvo@bellatlantic.com
Subject: Escalation - Phase III Launch Plan
Importance: High

Mike:
The current outages and other problems with the Web III GUI show that this
product has been inadequately tested by Bell Atlantic and currently does
not
meet the needs of the CLEC community. MCI WorldCom has been using the GUI
III for three weeks, but excessive downtime, problems with access, and
limited feature/functionality have forced MCI WorldCom to instruct its
users
to revert to the Common Phase II GUI for all transactions. For this
reason,
MCI WorldCom requests that Bell Atlantic keep the Phase II or Common GUI in
effect until all problems with the GUI III are corrected and a user
acceptance test is passed successfully.
On October 28 1999, Bell Atlantic hosted a conference with approximately 30
participating CLEC members. Throughout the question and answer period, it
became apparent there were numerous and significant issues. Of particular
note was the unacceptable response time of GUI III for both preorder
queries
as well as issuing trouble tickets and service orders. Several CLECs voiced
this concern as well as "time out" problems, citing actual trouble ticket
numbers. "Held" orders, Help Desk, and Administrators ID's were also major
points of discussion.

MCI WorldCom has experienced the following problems in using GUI III over
the last three weeks, leading to our decision to instruct our users to go
back to the Common GUI:
1. Documented internet outages; examples from the last three weeks:
10/12: no internet access
10/13: no internet access
10/14: no internet access
10/20: no internet access

10/25: no internet access
10/26: no internet access
11/1: no internet access

2.   Users are unable to Supp. Orders. Inability to add telephone numbers
after passing the "add key values" screen.
3.   Users are unable to Supp. Orders to change a date or cancel an order.
The
entire order must be rekeyed.
4.   Inability to use "continuous values" for multiple numbers (automated
functionality lost from Phase II GUI)
5.   Slow response times processing LSR's, CSR's and Inquires. Information is
lost. Time out issue here. Repetitive log-ins required daily.
6.   Help desk provides less than accurate information regarding "system" and
"process" responsibilities.
7.   Inability to search (cross-view) other users held orders. Repair tickets
apply as well. Can't edit orders that someone else has submitted.
8.   Multiple orders cannot be worked until the first one processed is
acknowledged. This creates a major workforce inefficiency with delays from
up to 1 to 24 hours.
         9.   The use of multiple windows is not allowed with GUI III.
10.   Adding additional listing into the directory service request cannot be
accomplished.
11. Referencing a specific PON delivers a totally different order.
12. Multiple log-ins required for "create new" for address validation.

These issues indicate substantial inadequacies. The Phase III Launch Plan
Key Points indicates that the Phase III GUI will in almost all cases
provide
the same transactions and business rules supported in Phase II and that
there will be no loss of data. However, MCI WorldCom users report that the
lack of GUI III usefulness severely affects our ability to conduct business
to such a degree that as of 10/28, Mass and Business Markets user groups
were asked to only use the Phase II GUI. At this time, GUI III is not
stable enough to support MCI WorldCom at parity with Bell Atlantic.
Further, it is MCI WorldCom's belief that GUI III will not be adequately
working by November 13.

MCI WorldCom requires that Bell Atlantic maintain the Phase II GUI until
all
issues are resolved to the extent that the use of GUI III allows MCI
WorldCom to conduct business without impairment.
MCI WorldCom is willing to work with Bell Atlantic to resolve these issues.
But until the time when these issues are resolved to a level of business

parity, MCI WorldCom requests the following:

1. Cancellation of the Phase II Shutdown Period and Continued Data
Migration
Period
2. Cancellation of the Phase II Complete Decommison
3. Correction of GUI III problems followed by 90 day user acceptance
testing.

Due to the urgency of this issue, MCI WorldCom requests a one day response
to these requests. In the event Bell Atlantic is unable to meet these
requests, MCI WorldCom will initiate a Level II escalation.

Sincerely,

Allison O'Neill
Eastern Carrier Management/OSS
MCI WorldCom
770-625-6846

cc: Kimberly Scardino
      Sherry Lichtenberg
      Marion Jordan
      Frank Salvo
      Charlene Keys
      Jenny Ross
      BA Change Control

October 29, 1999

Mr. Antonio Yanez
Vice President TIS
Bell Atlantic
222 Bloomingdale Rd.
White Plains, NewYork 10605

Dear Tony:

MCIWorldCom continues to have significant concerns with the growing number of outstanding missing firm order confirmations, acknowledgements, and notices of completions (collectively "notifications") for UNE-P orders placed with Bell Atlantic-New York since August 1999. We have sent files identifying the backlog items and opened trouble tickets with Bell Atlantic (see attachment 1) in an attempt to resolve these issues, however we continue to experience delays with Bell Atlantic's resolution of the notifications backlog, which is significantly impacting our business.

This is the second time MCIWorldCom has experienced a backlog of notifications, and we are extremely concerned about Bell Atlantic's ability to send timely notifications and resolve the outstanding backlog. MCIWorldCom believed that the backlog issues were resolved in August 1999. Unfortunately, it is now clear that despite Bell Atlantic's statements to the contrary, this problem has not been corrected. As you can see from the data provided in Attachment 1, the problems re-appeared in August/September and continue today.

MCIWorldCom sent written notification to the Bell Atlantic Account Team to re-establish weekly backlog resolution meetings on 9/29/99. This was required because Bell Atlantic was not working the notification problems identified by MCIWorldCom's Local Order Coordination Group. The meetings are now twice a week due to the growth in the backlog and the criticality of resolving these issues. Eight critical unresolved issues from the weekly calls are identified in Attachment 1 that must be closed.

Given the magnitude and significance of this problem, MCIWorldCom requests Executive involvement to ensure that the dates identified in Attachment 1 are met. MCIWorldCom requests an action plan by November 5, 1999.

Sincerely,

Marcel Henry

cc: Marion Jordan
        Robbie Rutstein
        Artie Zanfini
        Charlene Keys
        Jennifer Ross
        WilliamCarney
        Kim Scardino

ATTACHMENT 1

MCIWORLDCOM has opened multiple trouble tickets with Bell Atlantic to address EDI ordering problems including missing orders, no billing completions, lack of Firm Order Confirmations (FOC), and missing order acknowledgements. The current backlog is as follows:

August:
695 Pending Completion
83 Pending FOC

September:
2900 Pending Acknowledgement
4649 Pending Completion
1062 Pending FOC

October:
1100 Pending Acknowledgement
2941 Pending Completion
473 Pending FOC

September/October
2300 Missing Orders

Help Desk Trouble Ticket Numbers
781045, 781045, 794691, 794669, 794679, 794700, 781503, 794684, 79741

STATUS AS OF 10/28/99 ON NOTIFICATION OPEN ISSUES

ISSUE 3: TROUBLE TICKET 781045 MISSING ACKs
BA reflowed 836 PONS. MCIW only received 146. On 11/1/99, re-flow PONs again but BA, EDINET, and MCIW will be on call together and validate/verify what is going through EDINET to identify where the problem exists.

ISSUE 4: PRODUCTION REPORT
BA requested to provide daily report showing completions to MCIW since 10/12/99. BA to verify report format 10/28/99 and clear with Change Control 11/1/99.

ISSUE 5: AUGUST REFLOW PENDING BILLING COMPLETIONS
Tickets 794691 for 83 pending confirmations. BA checked status and found 65 queries of 83 and sent them back to MCIW. MCIW did not receive confirmation of queries. BA to reflow the 65 queries on 11/1/99. EDINET will be validated as in issue 3.

Remaining 18 PONS BA identified 11 completed, 3 completed note status, 3 confirmed, 1 can't be found. BA to validate all with TISOC. TISOC results due by 11/2/99.

Tickets 794669 for 695 Pending Completions for August. 248 reflowed 10/28/99 and list of what PONS were reflowed will be given to MCIW. On 50 of the 695 PONs, BA does not see the PON so BA does not even have the order. BA could not say whether the 50 were PONS were canceled by BA for no response by MCIW. BA TISOC will investigate by 11/2/99, best effort. 397 PONs

remain under investigation (TISOC needed) and BA does not have analysis completed, due by 11/4/97, best effort.

ISSUE 6: SEPTEMBER PENDING BILLING COMPLETIONS
Ticket 794679 PONs remain under analysis and will reflow what is found of 4649 pending completion by 11/4/99. TISOC to provide further breakdown of PONs not to show number of completions, confirmations, queries. If PONs in a completion status, BA will reflow.

Ticket 794700 1062 Sept PONS pending completion still under investigation with TISOC. Analysis on these PONS is due 11/4/99. (This is what is found this is what will be done.)

ISSUE 9: PONs DROPPING TO PCD STATUS DUE TO DUPLICATE PIC CODE ORDERS FROM CARE THEN LSR MIGRATION
MCIW is investigating the process internally. At this time, MCIW changes the PIC via CARE when a migration order is taken to convert the customer to MCIW long distance. In addition, an order is sent to migrate the customer to MCIW.

Bell Atlantic North to investigate the billing logic to make the order drop to PCD status for manual handling. MCIW believes there is a system edit that is not required and is causing the issue. BA to have a billing expert evaluate the edit by 11/2/99.

ISSUE 10: TISOC TO CREATE REPORT TO IDENTIFY TOTAL COUNT OF MCIWORLDCOM PONS IN A PCD STATUS
BA stated it would not provide report for PCD status. Given that 20% of MCIW's orders can result in PCD status, MCIW is now escalating to the request to have BA provide this report to Executive Management. The issue will no longer be discussed on the bi-weekly calls.

ISSUE 12: OCTOBER PENDING CONFIRMATIONS AND BCNS
Ticket 794684 - 2,941 pending completion PONS for October are still under investigation, BA will attempt to flow through what is found. Remaining will require additional research and BA wants to use what it finds from Sept backlog analysis before completing these. BA will provide an expected completion date by 11/4/99. MCIW is requesting the week of 11/8/99 as a target completion date.

ISSUE 14: MWCOM REQUEST JEOPARDY REPORT USING EXCEL SPREADSHEET
First, BA said it will compare TISOC manual fax report to OQS report available daily via FTP. The goal is to gain report that can be used electronically to run against MCIW systems to clear backlog. BA to complete the comparison by 11/4/99.

Second, MCIW is requesting a report that identifies what MCIW orders are cancelled by BA based on lack of response from MCIW. BA does not provide EDI notifications on cancellations done by BA on MCIW orders. BA to confirm or deny report availability to MCIW by 11/4/99.